REMARKS

Reconsideration of this application as amended is respectfully requested.

In the Office Action dated September, 22, 2005, claims 1-117 were pending. Claims 1-30, 33-62 and 65-92 were rejected under 35 U.S.C. §112, first paragraph. Claims 1-62 and 65-96 were rejected under 35 U.S.C. §112, second paragraph. Claims 31,32,63,64,95 and 96 were rejected under 35 U.S.C. §102(e). Claims 97-117 were rejected under 35 U.S.C. §103(a).

In this response, paragraphs [0041] and [0045], claims 1, 31, 33, 63, 65, 95 and 97 have been amended. No new matter has been added.

Amendments

Amendments to the Specification

Paragraph **[0041]** has been amended to correct the reference number to the *virtual dictionary* in **Figure 6A** as 609. Paragraph **[0045]** has been amended to correct the reference number to the *evaluation unit* in **Figure 8** as 604 in place of 609, which refers to the *virtual dictionary* in **Figure 8** instead.

Amendments to the Claims

Claims 1, 31, 33, 63, 65, 95, and 97 have been amended. No new matter has been added. Support for the amendments can be found throughout the specification as filed; however, Applicant specifically directs the Examiner's attention to paragraphs 0037, 0041, 0044, 0045 and 0047.

Rejections

Claims 1-30, 33-62 and 65-92 stand rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. Claims 1-62 and 65-69 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite in that it fails to point out what is included or excluded by the claim language. Claims 31, 32, 63, 64, 95 and 96 are rejected under 35 U.S.C. 102(e) as being anticipated by Tadano et al. ("Tadano"), U.S. Patent No. 6,542,090. Claims 97-117 stand rejected under 35 U.S.C. 103(a) as

being anticipated by Tadano et al. in view of Critchlow et al. ("Critchlow"), U.S. Patent No. 6,401,060.

Rejections under 35 U.S.C. § 112, first paragraph

Claims **1-30, 33-36 and 65-92**

Claims 1-30, 33-36 and 65-92 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Applicant respectfully submits that Applicant's specification, as amended, satisfies the enablement requirement of the invention as claimed in claims 1-30, 33-36 and 65-92, as amended.

Claims 1, 33 and 65, as amended, all include "creating artificially created words as third character strings corresponding to the plurality of sub-strings". Support for this claim could be found, for example, in paragraphs **[0043]** and **[0046]**. In paragraph **[1146]**, referring to **Figure 9**, the specification discloses "At the same time, the method creates *third character strings* corresponding to the *sub-strings* through a virtual dictionary" (*emphasis* added), pages 23-24. In paragraph **[0043]**, referring to **Figure 6B**, the specification discloses "the virtual dictionary 655 takes the *sub-strings* 652 and creates a set of corresponding *artificial katakana words* 656. By combining the regular words 654 from the dictionaries 653 and the *artificial katakana words* 656 generated from the virtual dictionary 655" (*emphasis* added), page 21. Also, the correspondence between "the *sub-strings* 652" and "and the *artificial katakana words* 656 generated from the virtual dictionary 655" is clearly disclosed in **Figure 6B**. Hence, the specification, as amended, enables one skilled in the art to make and/or use the invention as claimed in claim 1, 33 and 65, as amended. Accordingly, Applicant respectfully submits that the specification, as amended, satisfies the enablement requirement under 35 U.S.C. § 112, first paragraph, for the invention claimed in claim 1, 33 and 65, as amended.

Given that claims 2-30 depend on claim1, as amended, claims 34-35 depend on claim 33, as amended, and claims 66-92 depend on claim 65, as amended, Applicant respectfully submits that the specification, as amended, for the similar reason, satisfies the enablement requirement under 35 U.S.C. § 112, first paragraph, for the invention claimed in claims 2-30, 34-35 and 66-69.

Rejections under 35 U.S.C. § 112, second paragraph

Claims **1-62 and 65-96**

Claims 1-62 and 65-96 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Applicant respectfully submits that claims 1-62 and 65-96, as amended, satisfies the requirement of 35 U.S.C. § 112, second paragraph.

Claims 1, 31, 33, 65 and 95, as amended, all end with a period (.). Thereby, the question of where these claims end is removed. As such, Applicant respectfully submits that claims 1, 31, 33, 65 and 95, as amended, satisfy the requirement under 35 U.S.C. §112, second paragraph.

Claims 2-30, 32, 34-62, 66-94 and 96 depend on claims 1, 31, 33, 65, and 95 respectively. For the similar reason, Applicant respectfully submits that claims 2-30, 32, 34-62, 66-94 and 96 satisfy the requirement under 35 U.S.C. § 112, second paragraph.

Rejections under 35 U.S.C. § 102(e)

Claims **31, 63 and 95**

Claims 31, 63, and 95 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Tadano. Applicant reserves the right to swear behind Tadano. Nonetheless, Applicant respectfully submits that Applicant's invention as claimed in claims 31, 63 and 95, as amended, is not anticipated by Tadano.

Specifically, for example, independent claim 31 as amended recites as follows:

> 31. A data processing system implemented method for converting a first Japanese character input string to a second Japanese character string, the method comprising:
>
> in response to a hiragana input, automatically determining a plurality of possible katakana candidates for each sub-string of the hiragana input;
>
> analyzing the plurality of possible katakana candidates to convert the hiragana input to katakana characters, each of the possible katakana candidates being associated with a score representing a relevancy between the sub-string of the hiragana input and a possible katakana candidate;
>
> selecting one of the katakana candidates having the highest score in response to the analyzing if a regular Japanese dictionary does not

contain one or more well-known Japanese words corresponding to the sub-string of the hiragana input; and

outputting converted text comprising the one of the katakana candidates to represent the hiragana input.

(emphasis added)

Independent claim 31 as amended includes generating katakana candidates for each hiragana character of an input that needs to be translated into Japanese words. If a regular Japanese dictionary does not contain well-known words for the input, one of the generated katakana candidates may be selected to represent the input. It is respectfully submitted that the above limitations are absent from Tadano.

In addition, independent claim 31 requires analyzing the plurality of possible katakana candidates to convert the hiragana input to katakana characters, each of the possible katakana candidates being associated with a score representing a relevancy between a hiragana character and a possible katakana candidate. This limitation is also absent from Tadano.

The office action states:

> "analyzing the plurality of possible katakana candidate to convert the hiragana input to katakana characters (necessarily a step of converting from hiragana to katakana (col. 7, line 35)"
> (Office Action page 3)

Office action acknowledged that Tadano does not disclose analyzing a plurality of possible katakana candidate to convert the hiragana input to katakana characters. Instead, office action asserts that this would be a necessary step. Applicant respectfully disagrees.

Rather, Tadano describes a conversion processing of finalized character codes as similar to a conventional processing (Tadano, col. 7, lines 3-9), including conversion from hiragana to katakana (Tadano, col. 7, line 35). Tadano also states the conversion among hiragana, katakana and alphabet is a character kind conversion (Tadano, col. 4, lines 19-21). In fact, direct conversion from hiragana to katakana is one of conventional methods to convert hiragana text to a Japanese text. As such, a conversion from hiragana to katakana does not necessarily include analyzing the plurality of possible katakana candidate.

In contrast, claim 31 as amended includes analyzing the plurality of possible katakana candidate to convert the hiragana input to katakana characters, particularly, if the regular dictionary does not contain such well-known words for the input.

In order to anticipate a claim, each and every limitations of the claim must be taught by the cited reference. It is respectfully submitted that Tadano fails to disclose each and every limitations set forth above. Therefore, it is respectfully submitted that claim 31 is not anticipated by Tadano.

Similarly, claims 63 and 95 include limitations similar to those recited in claim 31. For the reasons similar to those discussed above, Tadano doesn't disclose all limitations of claims 63 and 95, as amended. Therefore, Applicant respectfully submits that claims 31, 63 and 95, as amended, are not anticipated by Tadano under 35 U.S.C. § 102(e).

Rejections under 35 U.S.C. § 103(a)

Claim **97-117**

Claims 97-117 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tadano in view of Critchlow. Applicant reserves the right to swear behind Tadano and/or Critchlow. Nonetheless, Applicant respectfully submits that Applicant's invention as claimed in claims 97-117, as amended, is patentable over Tadano in view of Critchlow.

Claim 97, as amended, states:

> 97. An apparatus for converting a source character string to a target character string, comprising:
> an input method for receiving the first character string having the source character string;
> a regular dictionary coupled to convert the first character string to second character strings;
> a virtual dictionary coupled to generate artificially created words as third character strings based on the first character string;

(emphasis added)

Tadano describes a conversion processing of finalized character codes as similar to a conventional processing (Tadano, col. 7, lines 3-9), including kana-kanji conversion

where a dictionary is referenced. The dictionary contains pronunciations and their corresponding kana and kanji (Tadano, col. 7, lines 43-48). Critchlow teaches a method to determine whether a typographical error exists by utilizing results of a word breaking component. A word breaking component parses a sentence into many possible words using a standard dictionary to check for valid phrases (Critchlow, col. 9, lines 23-26, 55-60). Critchlow also describes using a more extended dictionary than is used by the word breaking component to determine if a hole is a typographical error. (Critchlow, col. 10, lines 20-25). Further, Critchlow states that the extended dictionary is used because of an accuracy/performance tradeoff. (Critchlow, col. 13, lines 15-35). However, nothing in Tadano and Critchlow, individually or in combination, describes or suggests "a virtual dictionary coupled to generate artificially created words" (emphasis added).

Moreover, there is no motivation to combine the teaching of Tanado with Critchlow. Tanano discloses techniques for character input mean. Critchlow, on the other hand, teaches techniques to detect errors in text documents. There is no suggestion in either reference to combine document error detection to input mean. Thus, the proposed combination is based on hindsight construction and is inappropriate.

Therefore, Tadano and Critchlow, individually or in combination, do not disclose the limitations of claim 97 as amended. As such, Applicant respectfully submits that claim 97, as amended, is patentable over Tadano in view of Critchlow under 35 U.S.C §103(a).

Given that claims 98-117 depend from and include the limitations of claim 97, Applicant respectfully submits that claim 98-117 are patentable over Tadano in view of Critchlow under 35 U.S.C. §103(a).

SUMMARY

Claims 1-117 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Vincent Lue at (408) 720-8300 x329.

Deposit Account Authorization

The required fee for a two month extension of time is enclosed. No additional fees are required for additional claims. Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if further extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR
& ZAFMAN LLP

Dated: February 15, 2006

Vincent Lue
Agent for Applicant
Registration No. 56,564

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300 x329